COMPLIANCE AND ENFORCEMENT DIVISION

OFFICE MEMORANDUM

May 24, 2001

TO: WILLIAM DEBOISBLANC, DIRECTOR OF PERMIT SERVICE

JIM GUTHRIE, DIRECTOR OF ENFORCEMENT JULIANUE RECORD OF FROM:

SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

SFPP, PLANT #4020

In keeping with standard practice, the Compliance and Enforcement Division has conducted a review of the compliance record of:

SFPP

This memorandum is intended to provide you with the results of the review, and to advise of further action, if any, that will be initiated by the Director of Enforcement.

Background

It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of the initial renewal of a Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior permit term or twelve months have been adequately addressed. Additionally, the review is intended to recommend such additional permit conditions and limitations as may be necessary to reasonably assure ongoing compliance.

Finding

The Enforcement Division staff has commenced a review of the records for SFPP for 5/1/00 to 5/1/01. This review was initiated as part of the District evaluation of an application by SFPP for a Title V Permit. During the period subject to review. SFPP's activities known to the District include:

Two Notice of Violations (NOVs) were issued during this review period. The first NOV #4770 was a 1 day violation issued for valves leaking in excess of 100 ppm (Regulation 8 Rule 18 section 302). The second NOV #4766 was a 12 day violation issued for failure to record the sump tank throughput (Regulation 2-1-307).

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The District did not receive alleged complaints.

SFPP is not under a Variance or an Order of Abatement by the District.

No monitor excesses or equipment breakdowns were reported or documented by District Staff for SFPP.

Conclusions

The Director of Enforcement finds that ongoing compliance can be reasonably assured for this facility, for the review period, due to the above record.

Recommendations

The Director of Enforcement believes that the proposed application for a Title V Permit is adequate and recommends that the Director of the Permit Services Division approve this application.

CC: Steve Chin

Vicki Dvorak

Brenda Cabral

Tony Gambardella